Case Name	DRI Set and Number	Description of each DRI	Documents Produced	Objections/Reasons Withheld	Burden	New Production	Date Produc
Re: New York City Policing During	DR No. 1	Provide all Documents concerning policies, procedures, directives, and training materials	Responsive documents previously provided. Any additional responsive documents will be				
ummer 2020 Demonstrations		promulgated by NYPD relating to Officers' treatment of and response to demonstrations and	provided prior to the Court-ordered date. Responsive documents can be found				
0 Civ. 8924; 20 Civ. 10291; 20 Civ.		protests (including mass protests), crowd control, crowd management, and/or "disorder	in:VOL002_Confidential				
0541; 21 Civ. 322; 21 Civ. 533; 21		control" that were created and/or in force prior to May 28, 2020, including, but not limited to,	VOL005_Confidential.				
iv. 1904		policies concerning:	VOL005_Not Confidential				
econd Amended Responses		a) Officers' use of tactics or objects to control crowds during a demonstration or protest;	VOL006_Not Confidential				
		b) Officers' use of force during a demonstration or protest;	VOL007_Confidential				
		c) Use of force reporting and investigations related to uses of force during a demonstration or	VOL007_Not Confidential				
		protest;	VOL008_Confidential				
		d) Officers' use of batons or other instruments during a demonstration or protest;	VOL008_Not Confidential				
		e) Officers' tactical use of other objects, such as shields and bicycles, during a	VOL009_Confidential				
		demonstration or protest;	VOL010_Confidential				
		f) Officers' use of Oleoresin Capsicum (also known as "OC" or "pepper spray") during a	VOL011_Not Confidential				
		demonstration or protest;	VOL014_Confidential				
		g) Technical Assistance Response Unit ("TARU") video and audio recording related to a	VOL018_Confidential				
		demonstration or protest;	VOL019_Not Confidential				
		h) Strategic Response and Strategic Response Group ("SRG") operations; i) Disorder Control Training;	VOL026_Confidential VOL031 Confidential				
		j) Officers' use of body worn cameras during a demonstration or protest;	VOL032 Confidential				
		k) Officers' use of zip-ties or flex cuffs during a demonstration or protest;	VOL035_Confidential				
		Officers' use of Kettling during a demonstration or protest;	VOL037_Confidential				
		m) Officers' interaction with, and treatment of, Legal Observers during a demonstration or	VOL039_Confidential Bates ranges to be priovided				
		protest;					
		n) Officers' interaction with, and treatment of, journalists, reporters, photographers, and					
		members of the press during a demonstration or protest;					
		o) Officers' enforcement of any applicable curfews in place during a demonstration or protest;					
		p) Incident command, chain of command, and command and control during a demonstration					
		or protest;					
		q) Facilitation, accommodation, and escort of demonstrations or protests;					
		r) First Amendment, Fourth Amendment, and Fourteenth Amendment principles applicable to					
		policing demonstrations or protests, including the requirements that content-neutral					
		restrictions on speech are narrowly tailored and provide ample alternatives for expression, as					
		well as the need to provide fair warning before making certain Arrests or engaging in certain					
		uses of force;					
		s) The need to give dispersal orders and a meaningful opportunity to comply with them before					
		making certain Arrests at a demonstration or protest;					
		t) Policies, procedures, or protocols relating to racial profiling;					
		u) Officers' use of race in law enforcement decisions and/or implicit bias;					
		v) Officers' use of racial slurs or epithets;					
		w) Officers' affiliation with or participation in groups or website that promote racists views;					
		x) Officers' Arrest of individuals during a demonstration or protest, including procedures for					
		effecting and processing large-scale or mass arrests;					
		y) Probable cause to Arrest for a Protest-Related Violation or Offense;					
		z) Discretion to Arrest for a Protest-Related Violation or Offense; aa) When to process an Arrest for a Protest-Related Violation or Offense for release with a					
		summons or Desk Appearance Ticket, or for arraignment, including during a demonstration or					
		a protest;					
		bb) Officers' transportation of people Arrested during or after a demonstration or protest;					
		cc) Officers' use of mass or large-scale arrest processing (including the use of a Mass Arrest					
		Processing Center), including related to a demonstration or a protest;					
		dd) Officers' provision of medical aid to civilians injured during a demonstration or protest;					
		ee) Officers' wearing of face coverings when interacting with the public during or after a					
		demonstration or protest, including during arrest processing; and					
		ff) Any other policies, procedures, directives or training associated with policing large-scale					
		events, including protests, demonstrations, and events involving civil disobedience.					
	DR No. 2	Provide all Documents concerning policies, procedures, directives, and training materials	Responsive documents previously provided. Any additional responsive documents will be				
		promulgated by NYPD during or after the Protests and relating to any and all subjects	provided prior to the Court-ordered date. Defendants also refer Plaintiffs to the NYPD				1
		described in Request No. 1, including but not limited to training provided during or after	Patrol Guide, available at https://www1.nyc.gov/site/ccrb/investigations/nypd-patrol-				
		October 2020, including recordings of such training, and any critique, evaluation, or review of	guide.page. Defendants further refer Plaintiffs to information concerning training received	1			1
		the effectiveness of such training.	by NYPD officers, available at				
			https://www1.nyc.gov/site/nypd/bureaus/administrative/training.page.Defendnats also				1
			refer Plainitffs to NYPD's reform and Reinvention at				1
			https://www1.nyc.gov/site/nypd/about/about-nypd/reformcollaborative.page Responsive	2			1
			documents can be found at: VOL002_Confidential				
			VOL005_Confidential				
	1	1	VOL005_Not Confidential	1	1	1	- 1

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DR No. 3 Provide all Documents concerning policies, procedures, directives, and training materials relating to any and all subjects described in Request No. 1 promulgated during or following any protest events in the past 10 years concerning the deaths of persons in police further refer Plaintiffs to the NYPD Patrol Guide, available at https://www1.nyc.gov/site/ccrb/investigations/nypd-patrol-guide.page. Defendants further refer Plaintiffs to information concerning training received by NYPD officers,	
I following any protest events in the past 10 years concerning the deaths of persons in police I further refer Plaintiffs to information concerning training received by NYPD officers.	
custody or whose deaths were otherwise caused by an Officer, including, but not limited to, available at	
Ramarley Graham, Akai Gurley, Eric Garner, Delrawn Small, and Sean Bell. https://www1.nyc.gov/site/nypd/bureaus/administrative/training.page.Defendnats also	
refer Plainitffs to NYPD's reform and Reinvention at	
https://www1.nyc.gov/site/nypd/about/about-nypd/reformcollaborative.page Responsive	
documents can be found at: VOL002_Confidential	
VOL005_Confidential	
VOL005_Not Confidential	
VOL006_Not Confidential	
VOL007 Confidential	
VOL007 Not Confidential	
DR No. 4 Provide all Documents concerning policies, procedures, directives, and training Responsive documents previously provided. Additional documents will be provided prior	
materials relating to any and all subjects described in Request No. 1 promulgated during or to April 15, 2022, to include deposition transcripts and their exhibits as previousl discussed	
following protests regarding the 2004 Republican National Convention or any of the lawsuits and documents previousl provided via FOIL request. Documents also availible via NYCLU's	
related to the policing of those protests.	
Testade to the portang of those process.	
DR No. 5 For any and all training materials, presentations, or other similar materials responsive to Defendants have been, and will continue to provide training information for named Defendants object to producing information regarding "all" trainings	
Request Nos. 1-4 above, Documents sufficient to identify the dates trainings were held, all defendants and deponents concerning training leld as irrelevant and not proportional to the needs of the case.	
persons who attended, any statistical reports of the ranks of members of the service that persons who attended, any statistical reports of the ranks of members of the service that persons who attended, any statistical reports of the ranks of members of the service that persons who attended and the service that persons who attended the	
attended, and any certifications issued to such attendees.  protocol, and will continue to provide responsive documents for named defendants and publicly available.	
deponents going forward.	
depotents going forward.	
DR No. 6 For each Officer identified in response to Interrogatory No. 1 in Plaintiffs' First Consolidated Defendants have been, and will continue to provide training information for named	
Set of Interrogatories to All Defendants, provide Documents sufficient to show whether and, if defendants and deponents. Defendants have provided documents concerning training	
so, the date(s) that the Officer received training related to the subjects described in Request received by named defendants and deponents pursuant to the agreed-upon deposition	
No. 1. protocol, and will continue to provide responsive documents for named defendants and	
DR No. 7 For each Protest Location listed in the attached Schedule A. Documents sufficient to identify Responsive documents previously provided, including rosters and incident commander	
the intended roles or functions, deployments, commands, and instructions provided to each information. TRI's, line of duty reports to be provided. Defendants previously produced	
and every Officer who was assigned to, or who responded to, the Protest Location, including command logs responsive to this request - See Defendants' production, Vol. 035.	
but not limited to documents identifying:  Defendants have searched for Threat Response Inquiry reports (TRIs) for each Protest	
a) The commanding Officer for each location; Location listed on Plaintiffs' Schedule A and are processing the documents located for	
b) The full name, shield number, tax identification number, assigned command, and rank of production by the Court-ordered deadline. Some have been previousl provided.	
each Officer deployed;  Defendants have searched for and located documents responsive to this request, including	
c) Each Officer's assignment post, including the assignment address and borough; "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief	
d) Any and all Officers assigned to supervise or oversee such deployment; of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and	
e) Any attorneys from either the NYPD or the NYC Law Department at each location; Strategic Response Group commands and are processing the documents located for	
f) All Threat Response Inquiry ("TRI"), Officer Injury Reports, Complaints, or other written production by the Court-ordered deadline. Defendants are in the process of completing a	
documentation of any kind related to such deployment; search of the shared drive of the Intelligence Division commands and will produce any	
g) All Unusual Incident or Occurrence Reports (PD370-152; UF-49); responsive documents by the Court-ordered deadline. Responsive documents can be	
h) All instructions or directives regardless of form regarding police equipment and uniforms    found at: VOL002_Confidential	
(including disorder control gear, face coverings, and so-called "mourning bands") to be worn or possessed by Officers during the assignment;	
i) Any communications relating to the decision to deploy Officers from the SRG and any VOL005_Not Confidential	
instructions or directives provided to the SRG or Officers assigned to such deployments.	
VOL037_Confidential	
VOL037_Not Confidential	
VOL039_Confidential	
VOL008_Confidential	
VOL008_Confidential_1	
VOL008_Not Confidential	

	DR No. 8	For each Protest listed on the attached Schedule A, provide the following	Responsive documents previously provided, including news clips, details, command logs,	As to plaintiffs' request set forth in Subsection 8(h) for all BWC	As to Subsection 8(h), it would be unduly burdensome for defendants to search	
	Jan Here	Documents:	SPRINTS, command logs, MAPC records. Bates/Volume numbers to be provided. Any	footage from each one of the more than 83 protests listed on	for, identify, and produce all BWC videos in existence from every officer who	
		a) Any and all intelligence reports, threat assessments, and information compiled and/or	additional responsive documents will be provided prior to the Court-ordered date, inluding	· ·	was present for any portion of every single one of the more than 83 protests on	
		reviewed in advance of and during the Protests, including all Documents reflecting Officers'	line of duty records, press inquiry records, etc Defendants previously produced news	it would be unduly burdensome for defendants to locate, identify	Schedule A. First, defendants note that while the table in Schedule A contains	
		planning for policing the Protests, and any spreadsheets or other lists of "scheduled" and	articles and press inquiries responsive to this request - See Defendants' production, Vol.	and produce the requested information, and that the request is not	· ·	
			035. Defendants previoulsy produced emails, details, command logs, SPRINTS, and MAPC	proportional to the needs of the case.	table actually refer to multiple protests as they indicate a time period covering	
		b) Any and all communications, tactical decisions, intelligence alerts, policies or other	records responsive to this request. Defendants have searched for and located documents	proportional to the needs of the ease.	multiple dates, such as "Protest No. 63," which refers to all protests at a	
		directives issued by any Officer as a result of such intelligence reports, assessments, or other	concerning LRAD activation and documents concerning dispersal orders or other warnings,		specified location from "June 23-30, 2020." Second, because plaintiffs have not	
		information pertaining to the Protests;	including MAPC worksheets, additional documents responsive to this request and are		identified any specific time frames, such as approximate start time to end time	
		c) News clips, social media postings, and internet links gathered by the NYPD, including but not	I		for the protests on Schedule A, where there was this only information provided	
		limited to such information and records gathered or created by the Office of the Deputy	Defendants have searched for TRIs, TARU video, and Aviation Unit Video for each Protest		to defendants in the absence of, e.g., the name of a plaintiff or any police	
		Commissioner for Public Information ("DCPI"), the Intelligence Division, or otherwise, related	Location listed on Plaintiffs' Schedule A and are processing the documents located for		officer defendants would be forced to undertake an enormous, labor-	
		to any Protest;	production by the Court-ordered deadline. Defendants have already produced all body-		intensive, and incredibly time-consuming and wasteful effort to search for and	
		d) Requests for detail, Operations Unit (including Detail Section) records, "204s", "Who's	worn camera ("BWC") videos recorded by officers in connection with the events alleged by		attempt to identify all videos from the alleged protest. This is because: (a)	
		Who," "Force Figures," "Detail Overview," roll calls, tactical plans, detail rosters, assignment	each of the consolidated plaintiffs, and for all individually-named defendant officers		without any particular hours to enter into the Evidence.com BWC database, the	
		sheets, internal communications, and other documents) concerning NYPD's deployment or	allegedly involved in said incidents with plaintiffs, plus BWC videos from other officers in		NYPD would have to conduct an unlimited, 24-hour search for all BWC videos for	
		assignment of Officers and resources relating to the Protests;	close physical proximity to plaintiffs and the named defendants at the time of those		each such date on Schedule A, and then review all BWC video results individually	
					to determine which might contain footage of the location indicated, in order to	
		e) Command Log(s) and other records created as a result of or related to the operation any Incident Command Post utilized in connection with policing a Protest;	alleged events, where possible; additionally, defendants have produced BWC footage for all defendant officers from all 83 protests on Schedule A for which they were present for		begin narrowing down the number of possible BWC videos from the protest	
		· -	<u> </u>		1	
		f) Records reflecting whether and, if so, by whom, when, and to what extent, dispersal orders or other warnings and opportunities to disperse or comply were given before enforcement	any amount of time, as well as for all other officers whom plaintiffs have deposed to date, including non-party witnesses. Defendants are in the process of completing a search for		indicated (notably, a search of the Evidence.com database conducted on 4/15/2022 for all BWC videos recorded City-wide on June 14, 2020 yielded over	
		action was taken at each Protest where force was used or detentions or Arrests were made;	MAPC documents AIDED Reports, and MTPs for each Protest Location listed on Plaintiffs'		10,000 videos, each of which NYPD would need to review individually, at least in	
		g) All To/From Memoranda, Unusual Occurrence Reports, U.F. 49s, Mass Arrest Reports	Schedule A and are processing the documents located for production by the Court-ordered		part, to determine which were responsive); (b) only a fraction of NYPD officers	
			deadline. Response documents can be found in: VOL002 Confidential			
		and/or any other Documents consisting of summaries, reviews, recaps, evaluations, critiques, after-action reports, or other reports following any Protest, including but not limited to Joint	VOL005_Not Confidential		had been issued the most updated body camera models in summer 2020, the Axon Body Camera-3 ("AB-3") which is the only type of BWC videos it is	
			=			
		Operations Center reports;	VOL008_Confidential		possible to search for by location in Evidence.com meaning that the	
		h) All videos, including TARU videos, bodyworn camera videos, and Aviation Unit videos;	VOL008_Not Confidential		overwhelming majority of all BWC footage recorded for all protests on Schedule	
			VOL009_Confidential		A was done by officers using older models of body cameras and cannot be	
		i) All audio recordings, including audio recordings of NYPD Citywide and other				
		radio communications;				
		j) SPRINT reports related to recorded communications (and documents sufficient to decipher				
		such SPRINT reports);				
		k) Internal NYPD communications, including, but not limited to, e-mails, text messages,				
		records regarding telephone calls made or received;				
		l) Any and all TRI Reports, and any and all Incident Worksheets (PD370-154), and any and all				
		TRI Incident-Investigating Supervisor's Assessment Reports (PD370-154A), any and all TRI				
		Interaction Reports, all Unusual Incident Reports, including any and all other Documents				
		relating to such reports and worksheets;				
		m) Command Log(s) from each arrest processing location to which a person arrested in				
		connection with a Protest was brought, including any Mass Arrest Processing Center				
		("MAPC");				
		n) MAPC intake and processing records;				
		o) Documents sufficient to identify all Arrests by Officers based on alleged conduct occurring				
		at each Protest Location, including Documents sufficient to identify the number of such				
		Arrests voided by the NYPD;				
		p) For any Officer who was injured during any Protest, any related Line of Duty injury				
		paperwork, including but not limited to AIDED Report(s), witness statement(s), and medical				
		records;				
		q) For any non-Officer injured related to a Protest, all records related to such injury, including				
		any AIDED Report, Medical Treatment of Prisoner Form, Central Booking Medical Screening				
		Form, Ambulance Call Report, Computer Aided Dispatch, FDNY Pre-Hospital Care Report, and				
1		other documents related to such injury;				
				1		· I
		r) Documents concerning press inquiries received by Defendants and/or press releases or				
		r) Documents concerning press inquiries received by Defendants and/or press releases or statements to the press made by individual Defendants or their agents related to any Protest,				

DR No. 9	For each person identified in response to Interrogatory No. 6 in Plaintiffs' First	Responsive documents previously provided including arrest records, property clerk	
DICINO. 3	Consolidated Set of Interrogatories to All Defendants, provide the following Documents:	invoices, activity logs and BWC for named defendants and deponents. Any additional	
	a) Any and all records created by Officers related to each person Arrested, including all arrest		
	processing paperwork;	in the process of completing searches for documents responsive to this request, including	
	b) Online Booking System ("OLBS") Report (including handwritten/scratch version);	OLBS reports, arrest processinc photographs, complaint reports, OLPA	
	c) Online Booking System Arrest Worksheet (PD244-159) (including handwritten/scratch	reports, property clerk invoices, activity logs, MTPs, C-summonses and DATs, and are	
	version);	processing the documents located for production by the Court-ordered deadline.	
	d) Arrest Report – Supplement (PD244-157);	Rssponsive documents can be found at:20210804 Initial-Disclosure	
	e) Prisoner Pedigree Card (PD244-092);	VOL005 Not Confidential	
	f) Arrest processing photographs, including digital movement slips and photographs taken as	VOL006 Confidential	
	part of NYPD large-scale or mass arrest processing;	VOL006_Not Confidential	
	g) Mass Arrest Pedigree Label (244-093);	VOL007_Confidential	
	h) Complaint Report (313-152) (including handwritten/scratch version);	VOL007_Not Confidential	
	i) Complaint Report Worksheet (313-152A) and Omniform Complaint Revision (including	VOL008_Confidential	
	handwritten/scratch versions);	VOL008_Not Confidential	
	j) Online Prisoner Arraignment ("OLPA") Report;	VOL009_Confidential	
	k) Property Clerk Invoice (521-141);	VOL010_Confidential	
	I) Records reflecting the disposition of property recorded in each such Property Clerk Invoice;		
	m) Medical Treatment of Prisoner (244-150);	VOL011_Not Confidential	
	n) Activity Logs (112-145) and other similar logs for the tour during which the incident	VOL012_Confidential	
	occurred for any and all Officers involved;	VOL013_Confidential	
	o) Scratch and/or memo book or activity log entries for any and all officers involved;	VOL014_Confidential	
	p) C-Summons;	VOL018_Not Confidential	
	q) Desk Appearance Ticket (PD 260-121);	VOL019_Confidential	
	r) Desk Appearance Ticket Investigation Sheets (360-091);	VOL019_Not Confidential  VOL024 Not Confidential	
	s) Records provided to any local prosecutor; t) DA Datasheets;	VOL024_Not commental  VOL026 Confidential	
	u) Decline to Prosecute Forms;	VOLO28 Confidential	
		VCCCCCOMMCHAM	+
	v) Criminal Court Complaint; and		
	w) Body worn camera footage associated with their Arrest, including associated audit trails		
DR No. 10	and activity logs  For each Protest Location listed in the attached Schedule A, provide Documents	Responsive documents previously provided with respect to all individuals for whom	+
DK NO. 10	sufficient to identify all persons stopped by Officers during the Protests, including:	paperwork was generated. Any additional responsive documents will be provided prior to	
	a) the date, time, and location of the encounter;	the Court-ordered date. Defendants are in the process of searching for stop reports	
	b) the name, rank, shield number, and command of any and all Officers involved;	responsive to this request for each Protest Location listed on Plaintiffs' Schedule A and are	
	c) the supervising Officer that made the decision and/or gave the order to stop the person;	processing the documents located for production by the Court-ordered deadline.	
	d) the identity of the person stopped; and	Responsive documents can be found at: 20210804 Initial-Disclosure	
	e) the total number of stops disaggregated by race, date the stops occurred, and the precinct		
	of the Officers involved.	VOL006_Confidential	
		VOL006_Not Confidential	
		VOL007_Confidential	
		VOL007_Not Confidential	
		VOL008_Confidential	
		VOL008_Not Confidential	
		VOL009_Confidential	
		VOL010_Confidential	
		VOL011_Confidential	
		VOL011_Not Confidential	
		VOL012_Confidential	
		VOL013_Confidential VOL014 Confidential	
		VOL014_Confidential  VOL018 Not Confidential	
		VOL018_Not confidential  VOL019 Confidential	
		VOL019_Confidential	
		VOL024 Not Confidential	
		VOLUZE_TOK Confidential	
		VOLUZE Confidential	
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DR No. 11	For each Protest Location listed in the attached Schedule A, provide Documents	:Defendants previoulsy produced arrest records for the named defendants and deponents		
	sufficient to identify all Arrests by Officers at such Protest Location, including but not limited	in response to this request. Defendants are in the process of completing searches for		
	to:	additional documents responsive to this request, including OLBS reports, arrest reports,		
	a) the total number of Arrests;	arrest processing photographs, OLPA reports, MAPC documents, and C-summonses, and		
	b) the total number of summonses related to those Arrests issued disaggregated by race, date	are processing the documents located for production by the Court-ordered deadline.		
	the summons was issued, and the command of the issuing Officers;	Responsive documents can be found at: 20210804_Initial-Disclosure		
	c) the total number of DATs issued elated to those Arrests disaggregated by race, date the DAT	=		
	was issued, and the command of the issuing Officers;	VOL006 Confidential		
	d) the total number of arrests processed on-line related to those Arrests disaggregated by	VOL006 Not Confidential		
	race, date of arrest, and the command of the arresting Officers;	VOL007_Confidential		
	e) the summons number, DAT number, and/or arrest number associated with each Arrest;	VOL007 Not Confidential		
	f) the full name, shield number, and tax identification number of the issuing or arresting	VOL008_Confidential		
	Officer;	VOLDOS Not Confidential		
	1 '	=		
	g) the identity of the person Arrested;	VOL009_Confidential		
	h) location where the Arrest occurred (i.e., borough and address);	VOL010_Confidential		
	i) length of time of custodial detention, including date and time of stop and date and time of	VOL011_Confidential		
	release;	VOL011_Not Confidential		
	j) criminal charge(s); and	VOL012_Confidential		
	k) disposition of any such charge(s).	VOL013_Confidential		
		VOL014_Confidential		
		VOL018_Not Confidential		
		VOL019_Confidential		
		VOL019_Not Confidential		
		VOL024_Not Confidential		
		VOL026_Confidential		l
		VOL028_Confidential		
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DR No. 12	Provide all Documents relating to policies, procedures, directives, and training materials	Provide all Documents relating to policies, procedures, directives, and training materials		
	regarding use of force reporting and investigation, including the completion of the TRI Incident			
	Worksheets (370-154) and the TRI Incident-Investigating Supervisor's Assessment Reports (370			
	154A), including but not limited to the Data Entry Guide for Threat, Resistance or Injury (TRI)	Reports (370-154A), including but not limited to the Data Entry Guide for Threat,		
	Incident Worksheet (SP542).	Resistance or Injury (TRI) Incident Worksheet (SP542).		
DR No. 13	For each Protest Location listed in the attached Schedule A, provide Documents sufficient to	Responsive documents previously provided. Any additional responsive documents,		
DIC 140. 15	identify each and every use of force by an Officer, including but not limited to information	including TRI's to the extent nopreviously provided, will be provided prior to the Court-		
	sufficient to show:	ordered date. Defendants have searched for Threat Response Inquiry reports (TRIs) for		
	a) the type of force used;			
		each Protest Location listed on Plaintiffs' Schedule A and are processing the documents		
	b) date/time when used;	located for production by the Court-ordered deadline. Responsive documents can be found		
	c) the full name, shield number, and tax identification number of the Officer using force;	at: 20210804_Initial-Disclosure		
	d) the assigned command of the Officer using force;	VOL007_Confidential		
	e) supervising Officer(s);	VOL007_Not Confidential		
	f) whether the Officer was on-duty or off-duty;	VOL008_Confidential		
	g) the location where the incident occurred (including borough);	VOL008_Not Confidential		
	h) the race and gender of individual against whom force was used; and	VOL010_Confidential		
	i) the factual circumstances surrounding the force used.	VOL011_Not Confidential		
		VOL014_Confidential		
		VOLO31 Confidential		
DR No. 14	For each Protest Location listed in the attached Schedule A, provide all	: Defendants previously produced documents responsive to this request. Defendants have		
	Documents concerning any incidents currently or formerly under investigation or referred for	searched for additional responsive documents for each Protest Location listed on Plaintiffs'		
	internal investigation by the NYPD (including but not limited to the Internal Affairs Bureau	Schedule A, including IAB reports and related documents, TARU video, Argus video, and		
	("IAB"), the Chief of Department ("COD"), Department Advocates Office, Office of the Chief	"49s" from the shared drives of the Internal Affairs Bureau, and the Office of the Chief of		
	of the Department, Risk Management Bureau, and/or Patrol Bureau Investigations) including	Department, and are processing the documents located for production by the Court-		
	all	ordered deadline. Responsive documents can be found at 20210804_Initial-Disclosure		
	related complaints, log entries, record reviews, video and audio recordings, all recordings of	VOL007 Confidential		
	interrogations of the members of service, interviews of any and all non-members of service as	VOL007 Not Confidential		
	well as members of services, body-worn camera footage and associated audit trails and	VOL008_Confidential		
	activity	VOL008 Not Confidential		
	logs, and radio transmissions, TARU recordings and any other recordings (such as Argus videos)	_		
	and/or, and any other Documents collected, considered, or reviewed, and any determinations,			l
	disciplinary recommendations, settlement offers, case analysis, or other outcome			
		VOL014_Confidential VOL031_Confidential		
	happened at such Protest Location.	VOL035_Confidential		
		VOL037_Confidential		
				l
DR No. 15	For each Protest Location listed in the attached Schedule A, provide all Documents concerning	Defendants previously produced all CCRB file documents responsive to this request - See		
	any incidents currently or formerly under investigation or referred for investigation by the	Defendants' production, Vol. 035 and Vol. 037.		
	Civilian Complaint Review Board ("CCRB") including all related complaints, video (including			
	Argus video) and audio recordings, body-worn camera footage and radio transmissions.			
	investigator notes and reports, and any other Documents collected, considered, or reviewed,			
	an any determinations, disciplinary recommendations, or other outcome recommendations			
	made by the NYPD or CCRB with respect to any occurrence that happened at such Protest			
	Location.			
1	Location.			

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	DR No. 16	For each Officer identified in response to Interrogatory Nos. 8 and/or 9 in Plaintiffs' First	Defendants have provided documents concerning CCRB and IAB investigations, and		
		Consolidated Set of Interrogatories to All Defendants, all personnel-related records in the	training records of named defendants and deponents pursuant to the agreed-upon		
		possession of the NYPD or the City of New York, including but not limited to:	deposition protocol, and will continue to provide responsive documents for named		
		a) Records reflecting the Officer's histories as to CCRB and IAB investigations, as well as	defendants and deponents going forward. Defendants have searched for additional		
		underlying records;	responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including		
		b) The Academy Transcript and all training logs and other records reflecting the NYPD training	IAB reports and related documents, and have requested and received from the CCRB		
		each Officer received at the NYPD Academy and after graduating the NYPD Academy;	additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A,		
		c) Central Personnel Index ("CPI") file records or similarly defined records;	and are processing the documents located for production by the Court-ordered deadline.		
		d) Any and all records concerning internal NYPD disciplinary action, letters in the personnel	Responsive documents were produced pursaunt to the deposition protocol, and can be		
		1: :			
		file, command discipline, chares and specifications, transfers, and/or warnings and	found at VOL001		
		admonishments;	VOL002_Confidential		
		e) Performance profiles, or similarly defined records;	VOL007_Not Confidential		
		f) Psychological Services Unit ("PSU") records or similarly defined records;	VOL008_Confidential		
		g) Risk Assessment Information Liability System ("RAILS") records;	VOL008_Confidential_1		
		h) Early warning or intervention records or similarly defined records;	VOL008 Not Confidential		
		i) Supervisor complaint reports or command discipline election reports;	VOL009_Confidential		
		i) Any and all letters requesting sealing of disciplinary records or charges;	VOL010 Confidential		
		,, ,	VOL011 Confidential		
		k) Any and all documents related to performance monitoring;	<del>-</del>		
		I) Giglio profiles and/or similar resume providing information regarding all internal NYPD and	VOL011_Not Confidential		
		CCRB complaints, investigations, and dispositions, including the Police Commissioner's case	VOL012_Confidential		
		analysis;	VOL014_Confidential		
		m) Records from the Internal Affairs Bureau, Inspectional Services Division, Office of the Chief	VOL018_Not Confidential		
		of the Department, or Department Advocates Office;	VOL022_Confidential		
		n) The caption, complaint, and records reflecting the disposition of any and all lawsuits against	VOL024 Not Confidential		
		each such Officer;	VOL026 Confidential		
		· · · · · · · · · · · · · · · · · · ·	VOL028 Confidential		
		civilian or departmental-generated complaints of police misconduct, dereliction of duty or	-		
			VOL029_Confidential		
		violation of the New York State penal laws or regulations of the NYPD, including but not	VOL030_Confidential		
	DR No. 17	Provide all Documents concerning Officers receiving discipline for misconduct occurring during	Defendants have provided documents concerning CCRB and IAB investigations of named		
		the Protests, or who have been recommended to receive discipline for such misconduct.	defendants and deponents pursuant to the agreed-upon deposition protocol, and will		
		and insteading of who have been recommended to receive also plane for such misconducti	continue to provide responsive documents for named defendants and deponents going		
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			forward. Defendants have also provided all CCRB reords with respect to the		
			Protests.Responsive documents avaialbe at: VOL001		
			VOL002_Confidential		
			VOL007_Not Confidential		
			VOL008_Confidential		
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			VOL030_Confidential		
			VOL031_Confidential		
			VOL032_Confidential		
			VOL035_Confidential		
			VOL035_Not Confidential		
			VOL037_Confidential		
	DR No. 18	Provide all Documents concerning communications from May 25, 2020 to present	Responsive documents previously provided in email discovery. Defendants have searched		
		between and among any and all NYPD personnel and personnel of the Office of the Mayor,	the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol,		
		including Mayor de Blasio or his designees, and the Mayor's Office of Criminal Justice,	Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic		
		regarding NYPD's planning for and response to any protest anticipated to take place in New	Response Group commands and are in the process of completing a search of the shared		
		York City following the death of George Floyd, including but not limited to the Protests.	drive of the Intelligence Division command for documents responsive to this request, and		
			will produce non-privileged responsive documents identified by the Court-ordered		
		<u> </u>	deadline.		
	DR No. 19	Provide all Documents concerning communications about any protest anticipated to take	Responsive documents previously provided in email discovery. ] Defendants have		
		place in New York City following the death of George Floyd, including but not limited to the	searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief		
		Protests from May 25, 2020 to present, by Defendants Mayor de Blasio, Commissioner Shea,	of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and		
		Chief Monahan, and all Borough Commanders, and Deputy Commissioner of Intelligence John			
		Miller.	shared drive of the Intelligence Division command for documents responsive to this		
			request, and will produce non-privileged responsive documents identified by the Court-		
l .			ordered deadline.		+
<b> </b>	DR No. 20	Provide all documents received by, referenced, or reviewed by Mayor de Blasio,	Defendants have previously produced emails responsive to this request. Defendants have		
		Commissioner Shea, and/or Chief Monahan, Borough Commanders, Deputy Commissioner of	searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief		
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		Intelligence John Miller, and Incident Commanders documenting occurrences and/or	of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and		1
		Intelligence John Miller, and Incident Commanders documenting occurrences and/or			
		Intelligence John Miller, and Incident Commanders documenting occurrences and/or interactions between Officers and civilians at any and all Protest Locations from May 28, 2020,	Strategic Response Group commands and are in the process of completing a search of the		
		Intelligence John Miller, and Incident Commanders documenting occurrences and/or	Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this		
		Intelligence John Miller, and Incident Commanders documenting occurrences and/or interactions between Officers and civilians at any and all Protest Locations from May 28, 2020,	Strategic Response Group commands and are in the process of completing a search of the		

## Case 1:20-cv-08924-CM Document 551-2 Filed 05/23/22 Page 7 of 17

	DR No. 21	For each Protest Location listed in the attached Schedule A, provide all communications	Responsive documents previously provided. Any additional responsive documents will be			
		between and among any Officers supervising, commanding, or otherwise directing NYPD's	provided prior to the Court-ordered date. Defendants have searched the shared drives of			
		response to the Protests at each Protest Location, including but not limited to communications	the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal			
		between and among Borough Commanders, SRG Command, and Deputy Commissioner of	Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group			
		Intelligence John Miller.	commands and are in the process of completing a search of the shared drive of the			
			Intelligence Division command for documents responsive to this request, and will produce			
			non-privileged responsive documents identified by the Court-ordered deadline.			
			Responsive documents provided in email discovery and at VOL005_Not Confidential			
			VOL010_Confidential			
	DD 11 22					
	DR No. 22	Provide all Documents, including all non-privileged communications, in Defendants'				
		possession, custody, or control concerning the December 30, 2020 Corporation Counsel Report				
		Pursuant to Executive Order 58 (June 20, 2020) Directing an Analysis of Factors Impacting the				
		George Floyd Protests in New York City, including any and all Documents received or reviewed				
		by Corporation Counsel in preparing such report.				
	DR No. 23	Provide all Documents, including all non-privileged communications, in Defendants' possession	Responsive documents previously provided. Responsive documents can be found at:			
		custody, or control concerning the December 2020 Report by the New York City Department	VOL003_Confidential			
		of Investigation ("DOI") titled: Investigation into NYPD Response to the George Floyd Protests,	VOL005_Not Confidential			
		including any and all Documents received or reviewed by DOI in preparing such report.	VOL007_Not Confidential			
			VOL008_Confidential			
			VOL008_Not Confidential			
			VOL009_Confidential			
			VOL010_Confidential			
			VOL015 Not Confidential			
			VOL017_Confidential			
			VOL018_Not Confidential			
			VOL039_Confidential			
	DR No. 24	Provide all Documents concerning any communications between any NYPD personnel,	Defendants have previously produced emails responsive to this request. Defendants have			
		including from the Community Affairs Bureau and/or any other neighborhood policing liaisons	searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief			
		and organizers of the Protests.	of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and			
			Strategic Response Group commands and are in the process of completing a search of the			
			shared drive of the Intelligence Division command for documents responsive to this			
			request, and will produce non-privileged responsive documents identified by the Court-			
			ordered deadline. Responsive documents can be found at: VOL005_Confidential			
			VOL005_Not Confidential			
			VOL008 Confidential			
			VOL008_Not Confidential			
			VOL009_Confidential			
			VOL010_Confidential			
			VOL015_Not Confidential			
	DR No. 25	Provide all Documents concerning reports, reviews, communications, discussions,	Responsive documents are currently being searched for in Law Department files and NYPD			
		assessments, and analyses, including but not limited to after-action reviews, Sentinel Event	files. Responsive documents will be provided prior to April 15, 2022			
		reviews, postmortem reviews, and project debriefs, concerning the NYPD's deployment of				
		officers to protests related to Occupy Wall Street (2011-2012) and in response to the death of				
		Eric Garner (2014-2015).				
	DR No. 26	Provide all Documents concerning the decision by then-District Judge Richard	No responsive documents exist.			
		Sullivan concerning defendant Monahan's actions as reported in Dinler v. City of New York,				
		No.				
		04 Civ. 7921 (RJS) (JCF), 2012 U.S. Dist. LEXIS 141851, at *27-39 (S.D.N.Y. Sept. 30, 2012),				
		including but not limited to discipline of defendant Monahan, changes in policies, directives,				
		orders, and/or instructions concerning group arrests.				
		orders, and/or instructions concerning group affests.				
	DR No. 27	Drovide all Deguments concerning the jun/s verdict against defendant A4	No recognition desuments, evict			
	DK NO. 27	Provide all Documents concerning the jury's verdict against defendant Monahan in Abdell v.	No responsive documents exist.			
		City of New York, No. 05 Civ. 8453 (RJS) (S.D.N.Y.), including but not limited to discipline of				
		defendant Monahan.				
	DR No. 28	Provide all Documents concerning the payment of the punitive damages awarded	No responsive documents exist.			
		in Abdell v. City of New York, No. 05 Civ. 8453 (RJS) (S.D.N.Y.).				
	DR No. 29	Provide all Documents concerning any disciplinary action taken regarding Deputy	No responsive documents exist.		T	
		Inspector Edward Winski concerning his actions during Occupy Wall Street protests, which				
		were				
		the subject of several litigations: Vincent v. Winski, No. 14 Civ. 7744; Gersbacher v. Winski, No.				
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		[14 Civ. 7600.	l I	I .	l l	
		14 Civ. 7600.				

DR No. 30	Provide all Documents concerning any complaint made to, or investigation by the NYPD or	Defendants have provided documents concerning all protest-related CCRB complaints and			
DK 140. 50	CCRB, of any NYPD officer displaying a "white power" symbol during any of the Protests listed				
	on the attached Schedule A.	the agreed-upon deposition protocol, and will continue to provide responsive documents			
	on the attached solitedate / ii	for named defendants and deponents going forward. Defendants have searched for			
		additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A,			
		including IAB reports and related documents; have requested and received from the CCRB			
		additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A;			
		and have searched the shared drives of the Police Commissioner's Office, Chief of			
		Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal			
		Justice Bureau, and Strategic Response Group commands and are in the process of			
		completing a search of the shared drive of the Intelligence Division command for			
		documents responsive to this request; and are processing the documents located for			
		production by the Court-ordered deadline. Responsive documents can be found at:			
		VOL001			
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		VOL010_Confidential			
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		VOL011_Not Confidential			
		VOL012_Confidential			
		VOL014_Confidential			
		VOL018_Not Confidential			
		VOL022_Confidential			
		VOL024_Not Confidential			
DR No. 31	Provide all Documents concerning any complaint made to or investigation by the NYPD or	Defendants have provided documents concerning all protest-related CCRB complaints and			
	CCRB, of any NYPD officer for making racist statements or for racist conduct, including but not	investigations, and IAB investigations, of named defendants and deponents pursuant to			
	limited to, racial profiling.	the agreed-upon deposition protocol, and will continue to provide responsive documents			
		for named defendants and deponents going forward. Defendants have searched for			
		additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A,			
		including IAB reports and related documents; have requested and received from the CCRB			
		additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A;			
		and have searched the shared drives of the Police Commissioner's Office, Chief of			
		Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal			
		Justice Bureau, and Strategic Response Group commands and are in the process of			
		completing a search of the shared drive of the Intelligence Division command for			
		documents responsive to this request; and are processing the documents located for			
		production by the Court-ordered deadline. Responsive documents can be found at: VOL001			
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Investigations or assessments.  Or named electromates and desponents going forward. Defendants have searched for additional reasonable documents for each Protest Location literal on Plantiffs Schedule A, including IAR reports and related documents, have required and received from the CCRB additional responsive documents interior on Plantiffs Schedule A, and have searched the shared drives of the including control interior on Plantiffs Schedule A, and have searched the shared drives of the including control interior on Plantiffs Schedule A, and have searched the shared drives of the including control interior on Plantiffs Schedule A, and have searched the shared drives of the including control interior on Plantiffs Schedule A, and have searched the shared drive of the including control interior of Plantiffs Schedule A, and have searched the shared documents on the shared drive of the including control interior of Plantiffs Schedule A, and have been and the shared drive of the including control interior of Plantiffs Schedule A, and have been and the shared drive of the including control interior of Plantiffs Schedule A, and have been and the shared drive of the including control interior of Plantiffs Schedule A, and have been and the shared drive of the including control interior of Plantiffs Schedule A, and have been and the shared drive of the including control interior of Plantiffs Schedule A, and have been and the shared drive of the including control interior of Plantiffs Schedule A, and the shared drive of the including control interior of Plantiffs Schedule A, and the shared drive of the including control interior of Plantiffs Schedule A, and the shared drive of the including control interior of Plantiffs Schedule A, and the shared drive of the including control interior of Plantiffs Schedule A, and the shared drive of the including control interior of Plantiffs Schedule A, and the shared control interior of Plantiffs Schedule A, and the shared control interior of Plantiffs Schedule A, and the shared contr					
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DR No. 34  All Documents concerning any investigation into NYPD officers' participation in online farigity/racist message boards, such as the Law Enforcement Rant site Deputy Inspector James  As previously stated, the NYPD Intelligence Bureau has no documents responsive to this request. IAB, Chief of Department and other relevant locations are being seearched.					
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DR No. 34 All Documents concerning any investigation into NYPD officers' participation in online far- right/racist message boards, such as the Law Enforcement Rant site Deputy Inspector James  As previously stated, the NYPD Intelligence Bureau has no documents responsive to this request. IAB, Chief of Department and other relevant locations are being seearched.			<del>-</del>		
DR No. 34 All Documents concerning any investigation into NYPD officers' participation in online far- right/racist message boards, such as the Law Enforcement Rant site Deputy Inspector James request. IAB, Chief of Department and other relevant locations are being seearched.					
right/racist message boards, such as the Law Enforcement Rant site Deputy Inspector James request. IAB, Chief of Department and other relevant locations are being seearched.			VULUZ4_NOT CONTIDENTIAL		
	DR No. 34	All Documents concerning any investigation into NYPD officers' participation in online far-	As previously stated, the NYPD Intelligence Bureau has no documents responsive to this		
Kobel posted on (see Sierra First Amended Complaint at ¶¶ 166-168). Documents, if any, to be provided prior to Court-ordered deadline.					
		Kobel posted on (see Sierra First Amended Complaint at ¶¶ 166-168).	Documents, if any,to be providedprior to Court-ordered deadline.		

DR No. 35	Provide all Documents concerning any discipline of any NYPD officer for use of racist language during the Protests.	Defendants have provided documents concerning all protest-related CCRB complaints and investigations, and IAB investigations, of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents; have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A; and have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request; and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL002_Confidential VOL009_Confidential VOL008_Not Confidential VOL008_Not Confidential VOL010_Confidential VOL011_Not Confidential VOL011_Not Confidential VOL011_Not Confidential VOL012_Confidential VOL012_Confidential VOL013_Not Confidential VOL014_Confidential VOL015_Not Confidential VOL015_Not Confidential VOL016_Not Confidential VOL016_Not Confidential VOL017_Not Confidential VOL018_Not Confidential VOL018_Not Confidential			
DR No. 36	Provide all Unusual Incident reports (UF-49s), after-action reports, to/from memoranda, and Mass Arrests Reports, made or maintained at any time, concerning the following protests:  a) World Economic Forum protests in 2002; b) Republican National Convention protests in 2004; c) Occupy Wall Street in 2011 and 2012; d) Black Lives Matter protests between 2013 and 2020; e) Pro-Trump car caravans on November 1, 2020.	Defendants have searched the shared drives of the Criminal Justice Bureau with the assistance of NYPD Lt. Stephen Czark for documents responsive to this request, including MAPC documents, and are processing the documents located for production by the Court-ordered deadline. With respect to documents concerning the protests related to the Republican National Convention in 2004, Defendants refer Plaintiffs to documents concerning the RNC protests produced in response to a previous FOIL request by Plainitff NYCLU, located at: https://www.nyclu.org/en/policing-protest-nypds-republican-national-convention-documents; and to eight (8) deposition transcripts from RNC-related lawsuits produced by Defendants via email on February 17, 2022. In addition, Defendants have located documents related to the RNC protests stored on an internal New York City Law Department database as well as additional deposition transcripts and are processing the documents for production by the Court-ordered deadline.			
DR No. 37	Provide all Documents concerning complaints, made at any time, alleging NYPD excessive force and use of racial epithets during policing of each protest listed in Request No. 36.	Defendants will provide electronically saved documents concerning complaints of excessive force, and racial epithets to the extent possible, during the mentioned protests from 2004-on, as previously agreed	Overly burdensome and not proportional to the needs of the case	Records prior to 2012 are not in electronic format, therefore difficult to searchfiles are not in electronic format and paper copies are in storage in one of three places. Depending on if they were indexed clearly and properly, they may be difficult to locate. From 2012 through 2018, "outside guidelines" files are paper only, some are in storage, and the same issues as above apply. Logs however, and not the entire files, are available in electronic format, but contain limited information. Moreover, the search funtionality of the elctronic system is limited. Excessive force complaints are a searchable category, however "racial epithets" is not. Moreover, it is unclear if date of incident is a searchable category, making it difficult to limit the searches to a particlar date of incident. In order to find complaints of use of racial epithets, each complaint would have to be individually reviewed for that informantion. It is estimated that it would take at least 250 hours to search for all requested documents, plus an additiaonl 150 hours to review, redact, and produce them.	
DR No. 38	Provide all Documents sufficient to identify all Arrests effected by Officers at each protest listed in Request No. 36, including the following information:  a) the total number of Arrests; b) the total number of summonses related to those Arrests issued disaggregated by race, date the summons was issued, and the command of the issuing Officers; c) the total number of DATs issued elated to those Arrests disaggregated by race, date the DAT was issued, and the command of the issuing Officers; d) the total number of arrests processed on-line related to those Arrests disaggregated by race, date of arrest, and the command of the arresting Officers; e) the summons number, DAT number, and/or arrest number associated with each Arrest; f) the full name, shield number, and tax identification number of the issuing or arresting Officer; g) the identity of the person Arrested; h) location where the Arrest occurred (i.e., borough and address); i) length of time of custodial detention, including date and time of stop and date and time of release; j) criminal charge(s); and k) disposition of any such charge(s).	VOL002_Confidential			

# Case 1:20-cv-08924-CM Document 551-2 Filed 05/23/22 Page 11 of 17

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DR No. 42 Provide the Academy Transcript and all training logs and other records reflecting the NYPD training each named Defendant received at the NYPD Academy and after graduating the NYPD Academy.  Defendants have provided documents concerning training received by named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants also refer Plaintiffs to information concerning training received by NYPD officers, available at https://www.l.nyc.gov/site/nypd/bureaus/administrative/training.page. Responsive documents were produced, and will continue to be provided my location and deponents pursuant to the deposition protocol.  DR No. 43 For each and every dataset produced pursuant to these Requests or in response to any of Plaintiffs' Interrogatories, provide any and all data dictionaries identifying and defining all		1			
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Plaintiffs' Interrogatories, provide any and all data dictionaries identifying and defining all		DR No. 43	For each and every dataset produced pursuant to these Requests or in response to any of	No data dictionaries exist.	
terms and codes used in each field of the dataset.		1			

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	DR No. 44	Provide all documents identified or relied upon in responding to Plaintiffs' Interrogatories served in these Actions	Defendants refer Plaintiffs to all documents produced in this litigation, and those to be produced prior to the Court Ordered deadline. These documents, as well as privileged communications between the Law Department and City agencies, including NYPD. OTM, CCRB, DOI were relied upon in responding to the intrerrogatories.			
In Re: New York City Policing During Summer 2020 Demonstrations 20 Civ. 8924	DR No. 45	Produce all the documents identified in Defendants' Initial Disclosures to the extent they have not been produced.	Responsive documents were provided, bearing Bates Nos. DEF000001-DEF000475			
Second Consolidated Set of Document Requests						
·	DR No. 46	Produce copies of all subpoenas Defendants served on any party, or any individual or entity, concerning this litigation.	No responsive documents exist, as no subpoenas were served.			
	DR No. 47	Produce all documents received in response to any subpoenas served.	No responsive documents exist, as no subpoenas were served.			
	DR No. 48	Produce any and all organizational chart(s) or other similar documents showing or explaining	, ,	Defendants object to producing the documents referred to by		
		the organizational structure of the NYPD, including information providing identification of the leadership and the command structure of every component part or organizational unit within NYPD.	Nos.DEF000458296-DEF000. This is the only document that explains the organizational	Bridget Fitzpatrick during meet and confers, as, upon further review, they are simply "phone books" and do not contain any information on the organizational structure of the NYPD. As such they are not responsive to this request.		
	DR No. 49	Produce all documents concerning the City of New York's contention that, "[c]lose to 400	Defendants have searched for and located documents responsive to this request, including			
		NYPD personnel were injured," at Protests as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Line of Duty reports and AIDED reports are processing the documents located for production by the Court-ordered deadline. In addition, Defendants have searched for "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division commands and will produce any responsive documents by the Court-ordered deadline. Some documents, already produced can be found at: VOL005_Confidential VOL007_Not Confidential VOL014_Confidential VOL015_Confidential VOL015_Confidential			
			VOL037 Confidential			
	DR No. 50	Produce all documents concerning any NYPD officer who was injured at a Protest.	Defendants have searched for and located documents responsive to this request, including Line of Duty reports and AIDED reports are processing the documents located for production by the Court-ordered deadline. In addition, Defendants have searched for "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division commands and will produce any responsive documents by the Court-ordered deadline. Some documents, already produced can be found at: VOL005_Confidential VOL007_Not Confidential VOL014_Confidential VOL035_Confidential VOL035_Confidential VOL035_Confidential VOL035_Confidential VOL035_Confidential			
	DR No. 51	Produce all HIPAA releases for all medical providers that treated any NYPD officer who was	Defendants will produce all HIPAA released for named defendant officers who have	Defendants object to this request to the extent it seeks HIPAA		
	DA NO. 31	injured at a Protest, including the 4 officers whose photos are on page 5 of Defendants'  Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	agreed to provide one by the Court-ordered deadline.	releases for non-party offices, on the grounds that there is no requirement to produced HIPAA releases for non-parties.  Nothwithstanding this objection, Defendants will reach out to injured non-party officers to ascertain whether they will agree to provide HIPAA releases, and will produce any such releases as received on a rolling basis.		
	DR No. 52	Produce all documents concerning the City of New York's contention that, "[p]rotestors set	Defendants have provided documents responsive to this request, including emails, and			,
		police cars ablaze; vandalized precinct houses; threw rocks, bricks, bottles at officers; stabbed	1			
		punched, bit officers; and hurled Molotov cocktails at officers," as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional documents, including AIDED Reports, Line of Duty reports, Fleet service reports, and other documents responsive to this request and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at VOL005_Confidential VOL007_Not Confidential VOL035_Confidential VOL035_Confidential VOL035_Confidential VOL035_Confidential VOL035_Confidential VOL008_Not Confidential VOL008_Not Confidential VOL008_Not Confidential VOL008_Confidential VOL009_Confidential VOL009_Confidential VOL001_Confidential VOL011_Confidential VOL011_Confidential VOL011_Not Confidential VOL011_Not Confidential VOL012_Not Confidential VOL022_Not Confidential VOL022_Not Confidential VOL022_Not Confidential VOL022_Not Confidential VOL005_Not Confidential VOL005_Not Confidential VOL006_Confidential VOL006_Confidential VOL006_Confidential VOL006_Not Confidential VOL006_Not Confidential VOL006_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL006_Not Confidential VOL007_Not Confidential VOL007_VOL006_Not Confidential VOL007_VOL006_Not Confidential VOL007_VOL006_Not Confidential VOL007_VOL006_VOL006_Not Confidential VOL007_VOL006_VOL006_Not Confidential VOL007_VOL006_VOL006_Not Confidential VOL007_VOL006_VO			

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DR No. 53	Produce all documents concerning any violence by participants of any Protest.	Defendants have provided documents responsive to this request, including emails, and		
		also AIDED reports and Line of Duty Reports of named defendants and deponents		
		pursuant to the agreed-upon deposition protocol, and will continue to provide responsive		
		documents for named defendants and deponents going forward. In addition, Defendants		
		previously produced news articles and press inquiries responsive to this request - See		
		Defendants' production, Vol. 035. Defendants have searched for additional documents,		
		including AIDED Reports, Line o Duty reports, Fleet service reports, and other documents		
		responsive to this request and are processing the documents located for production by the		
		Court-ordered deadline. Responsive documents can be found at: VOL001		
		VOL005 Not Confidential		
		VOL008_Confidential		
		VOL008_Not Confidential		
		VOL009 Confidential		
		VOL010_Confidential		
		VOL011_Confidential		
		VOL011_Not Confidential		
		VOL014_Confidential		
		VOL017_Confidential		
		VOL018_Not Confidential		
		VOL022_Not Confidential		
		VOL024_Not Confidential		
		VOL035_Confidential VOL005_Confidential		
		VOL007_Not Confidential		
		VOL014_Confidential		
		VOL035_Confidential		
		VOL037_Confidential		
DR No. 54	Produce all documents concerning the City of New York's contention that, "The City of New	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention		
	York already has committed to implementing numerous changes to the NYPD, recommended	Collaborative website available at at https://www1.nyc.gov/site/policereform/index.page,		
	in the wake of these unprecedented protests, and is also finalizing a Reform and Reinvention	provided previously.		
	Plan, required by the State of New York of all localities receiving state funds," as stated on			
	page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
DR No. 55	Produce all documents concerning the City of New York's contention that, "there is no history	Defendant refer plaintiffs to publicly available media sources, and the jury		
	of unlawful policing [by the NYPD] at protests" and "there is no history of unconstitutional	verdicts/settlements/Orders on motions in lawsuits against the City of New York/ NYPD		
	policing at protests by NYPD," as stated on page 2 of Defendants' Memorandum of Law in	officers arising from Occupy Wall Street Protests, WEF Protests and Anti-War Protests.		
	Support of their Motion to Dismiss (Dkt 106).	Defendants do not have any particular documents to prove this negative, other than		
	Support of their Motion to Distriss (DRt 100).	settlement agreements which do not admit fault, at least 5 defense verdicts, and		
		numerous Rule 12 and Rule 56 decisions in thier favor.		
DR No. 56	Produce all documents concerning the City of New York's contention that, "police seized	Defendants refer Plaintiffs to previously produced documents responsive to this request,		
DK NO. 30	- · · · · · · · · · · · · · · · · · · ·			
	hammers, lighter fluid, gas masks, and fireworks from protesters headed to the Mott Haven	including DEF000195-DEF000196; DEF000201-DEF000203; DEF000210-DEF000212;		
	protests on June 4, 2020," as stated on page 6 of Defendants' Memorandum of Law in Support			
	of their Motion to Dismiss (Dkt 106).	additional documents responsive to this request, including OLBS reports, arrest reports,		
		and property clerk invoices, and are processing the documents located for production by		
<u> </u>		the Court-ordered deadline.		1
DR No. 57	Produce all documents concerning the City of New York's contention that, "[i]n response to	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention		
	the unprecedented protests and at the Governor's directive, the City of New York is revamping			
		provided previously, as well as updated patrol guide procedures from October 2020-		
1	Law in Support of their Motion to Dismiss (Dkt 106).	present.		
DR No. 58	Produce all drafts of any "plans for reinventing the police," as stated on page 6 of Defendants'	Defendants will not produce documents responsive to this request.	Defendants object to this request on the grounds that is seeks draft	
	Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), submitted by the		documents protected by the deliberative process provilege as well	
	Mayor, and all documents concerning those drafts.		as documents protected by the attorney client privilege.	
DR No. 59	Produce all documents concerning the City of New York's contention that it accepted "all 30	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention		
	collective recommendations from both agencies" as stated on Page 7 of Defendants'	Collaborative website available at at https://www1.nyc.gov/site/policereform/index.page,		
	Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), as well as documents	provided previously.		
	concerning those recommendations.			
DR No. 60	Produce all documents concerning the City of New York's contention that it accepted "the City	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention		1
	has implemented (and is considering implementing) a plethora of actions, including drafting a	· ·		
	new policy concerning First Amendment rights at protests and disorder control tactics;	provided previously.		
	assessing existing training to develop new content related to protest, de-escalation, and crowd			
	psychology," as stated on Page 7 of Defendants' Memorandum of Law in Support of their			
	Motion to Dismiss (Dkt 106), as well as documents concerning those policies and trainings.			
				1 1

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DR No. 61	Produce all documents concerning the nature and structure of each of the below-listed	Defendants will not produce documents responsive to this request.	Defendants object to this request on the grounds that the burden	Defendants state that the burden and expense of responding to this request is		
DK NO. 01	- I	Defendants will not produce documents responsive to this request.	· · · · · · · · · · · · · · · · · · ·	· · · · · ·		
	databases and/or information systems, including, but not limited to, documents sufficient to			not proportional to the needs of this case because locating the information		
	identify the database(s) or other location(s) in which the underlying data housed in or		the needs of the case, as detailed in column "F".	sought by this request would take at least 11 different people at least 15 hours		
	accessible through each NYPD front-end system are stored, and including documents		,	each to gather and put in writing responsive information.		
				leach to gather and put in writing responsive information.		
	concerning: the information contained in each database and system; the fields in each					
	database and system; the manner in which changes to the database/information system are					
	logged; how audit logs are created and stored in the database and system; documentation of					
	what information is stored in the database and system and how it is stored; all of the ways in					
	which the database and system can be searched and queried; how information can be					
	exported from the database and system; and any and all documents concerning training					
	materials used in training users of the database or system.					
	a.NYPD's Crime Database Warehouse (CDW) and any related database(s);					
	b.NYPD's Domain Awareness System (DAS) and any related database(s);					
	c.NYPD's Omniform System and any related database(s);					
	d.NYPD's Real Time Crime Center (RTCC) and any related database(s);					
	e.NYPD's Electronic Case Management System (ECMS) and any related database(s);					
	f.NYPD's Property and Evidence Tracking System (PETS) and any related database(s);					
	g.NYPD's Activity Log - Electronic memo book application and any related database(s);					
	h.NYPD's Department iPhones and iPads;					
	i.NYPD's Finest Online Records Management System (FORMS) and related database(s);					
	j.NYPD's Automated Roll Call System (ARCS) and related database(s); and					
	k.NYPD camera ESI storage systems and related database(s), including, but not limited to,					
	such systems and databases related to Body Worn Cameras (BWC) footage; Technical				1	
					1	
	Assistance and Response Unit (TARU) footage (including the TARU Job Tracker system);					
	Aviation Unit footage; ARGUS closed circuit television (CCTV) systems; and NYPD facility				1	
	camera footage (including Mass Arrest Processing Center (MAPC) footage).				1	
DR No. C2		Defendants refer Disintiffs to the information and included the contract of th			<del>                                     </del>	
DR No. 62	Produce all documents concerning how Body Worn Camera video is collected and stored,	Defendants refer Plaintiffs to the information previously exchanged about Body Worn			1	
	including all documents concerning the protocols for preserving this video, the software used	Camera collection and storage during meet and confers between the parties on February 3,			1	
	to house and/or manage this video, how this video is exported from the Body Worn Camera	2022, February 15, 2022, as well as at the Court Conference with the parties on February				
	devices, and what audit trails and metadata are available regarding the Body Worn Camera	11, 2022 (see Tr., p. 25-45). Defendants also refer Plaintiffs to the manual referenced by			1	
	devices and the video they create.	Mr. Rickner during the Court Conference on February 11, 2022 (see Tr., p. 25-26), and to				
	·	the information exchanged by the parties at the meet and confer between the parties in				
		August 2021, referenced by Mr. Rickner during the Court Conference on February 11, 2021				
		(see Tr., p. 23-24).				
DR No. 63	Produce all documents concerning the applications available on, data stored on, and usage of					
DK 140. 03						
	the tablets and smartphones provided to individual members of the NYPD, including, but not	deadline. ITB and Chief of Training divisions are beign searched for responsive documents.				
	limited to, training materials used in training tablet and smartphone users.					
	· · · · · · · · · · · · · · · · · · ·				1	
DR No. 64	Produce all documents reflecting the deployment and use of video/photographic equipment in	Defendants have previously produced TARU logs responsive to this request - See				
	connection with each of the Protests that are required to be created under NYPD Patrol Guide	Defendants' production, Vol. 035 and Vol. 037. Defendants have searched for and located				
	212-71 ("Guidelines for the Use of Video/Photographic Equipment by Operational Personnel at					
	Demonstrations") and PG 212-72 ("Guidelines for Uniformed Members of the Service	the documents located for production by the Court-ordered deadline.				
	Conducting Investigations Regarding Political Activities"), including, but not limited to: the					
	report required to be submitted to the NYPD's Legal Bureau according to ¶¶ 1-4 of PG 212-71					
	and all documents created as a result of or in response to it (such as Legal Bureau and					
	Intelligence Division records reflecting compliance with the Handschu v. Special Services					
	Division consent decree); the serially numbered log maintained by the NYPD's Technical					
	Assistance Response Unit ("TARU") under ¶¶ 5-6 of PG 212-71 related to all TARU					
	deployments on each date on which one of the Protests took place; TARU Job Reports from					
	the TARU Job Tracker system, or other, similar documents, related to each use of					
	video/photographic equipment related to one of the Protests; all records regarding requests					
	made to obtain or review such recordings or photographs made in writing to the Deputy					
	Commissioner, Legal Matters and whether such requests were granted; and all other				1	
					j	
	documents required to be created under PG 212-71 that are in the possession of the NYPD's					
	TARU, Legal Bureau, Chief of Department's Office, Operations Unit, and within each Bureau or				1	
	Borough Command that requested the use of video or photographic equipment related to any				1	
					1	
	Protest(s).					
DR No. 65	Produce all documents concerning the NYPD's use of data analytics and predictive policing as	No responsive documents exist.				
	it relates to the policing of protesting, including how this technology was used to respond to					
					1	
	the Protests.					
DR No. 66	Produce all documents concerning the NYPD's Surveillance of participants of Protests online	Defendants have previously produced emails responsive to this request. Defendants have			1	
	and their online activities, including all Surveillance by the NYPD's Social Media Analysis	searched for documents responsive to this request, including "49s," on the shared drives of			1	
					j	
	Research Team (SMART), Intelligence Division, or Counter-Terrorism Bureau.	the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal			1	
		Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group			1	
		commands and are processing the documents located for production by the Court-ordered			1	
					1	
1	1	deadline. Defendants are in the process of completing a search of the shared drive of the	I .			
		Intelligence Division command and will produce any responsive documents by the Court-				
		Intelligence Division command and will produce any responsive documents by the Court-				
		Intelligence Division command and will produce any responsive documents by the Court-				
DR No. 67	Produce all documents concerning the use of facial recognition software on any video or	Intelligence Division command and will produce any responsive documents by the Court-				
DR No. 67	Produce all documents concerning the use of facial recognition software on any video or	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential				
DR No. 67	photographs of the Protests, including the Dataworks Plus software and any such work by the	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential				
 DR No. 67		Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
DR No. 67  DR No. 68	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
DR No. 68	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-referenced with any other data in any other database.	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.  No responsive documents exist.				
	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-referenced with any other data in any other database.  Produce all documents concerning the use of Stingray devices, or any other device that	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.				
DR No. 68	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-referenced with any other data in any other database.  Produce all documents concerning the use of Stingray devices, or any other device that monitors cell phones, at the Protests, as well as documents concerning any information	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.  No responsive documents exist.				
DR No. 68	photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.  Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-referenced with any other data in any other database.  Produce all documents concerning the use of Stingray devices, or any other device that	Intelligence Division command and will produce any responsive documents by the Court- ordered deadline. Responsive documents can be found at: VOL035_Confidential  No responsive documents exist.  No responsive documents exist.				

DR No. 70	Produce all documents concerning the Mayor's contention that "what happened in Mott	Defendants have previously produced documents and emails responsive to this request.		
	Haven is something that the NYPD saw coming," including all documents concerning the	Defendants have searched for documents responsive to this request, including "49s," on		
	Surveillance preceding the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A)	the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol,	1	
	and all documents concerning any decision regarding the use of force at that Protest.	Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic		
		Response Group commands and are processing the documents located for production by		
		the Court-ordered deadline. Defendants are in the process of completing a search of the		
		shared drive of the Intelligence Division command and will produce any responsive		
		documents by the Court-ordered deadline. Responsive documents can be found at:VOL001		
		VOL005_Not Confidential		
		VOL008 Confidential		
		VOL008 Not Confidential		
		<del>-</del>		
		VOL009_Confidential		
		VOL010_Confidential		
		VOL011 Confidential		
		VOL011 Not Confidential		
		<del>-</del>		
		VOL014_Confidential		
		VOL017_Confidential		
		VOL018_Not Confidential		
		VOL022 Not Confidential		
		VOL024 Not Confidential		
		_		
		VOL035_Confidential		
DR No. 71	Produce all documents concerning the Mayor's contention that "the NYPD has acted	Defendants have previously produced emails responsive to this request, in the "OTM" email	1	
	appropriately," after video emerged showing an NYPD SUV driving into a crowd of protestors	volume. Defendants have searched for documents responsive to this request, including		
	on May 30, 2020.	"49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief	:	
		of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and		
		Strategic Response Group commands and are processing the documents located for		
		production by the Court-ordered deadline. Defendants are in the process of completing a		
		search of the shared drive of the Intelligence Division command and will produce any		
		responsive documents by the Court-ordered deadline. Defenants refer the plaintiffs to the		
		video referenced, adn any subsequest media coverage.		
DR No. 72	Produce all documents concerning videos of Protests, from May 28, 2020 to June 3, 2020, that	Defendants have previously produced emails responsive to this request, as well as video		
	the Mayor viewed or that were shown to the Mayor on or before June 4, 2020.	footage. There is no document/documents that note the specific videos the Mayor		
	are mayor tremed or tract tree shown to the mayor or or selections of the	vieweed or was shown.		
DR No. 73	Produce all documents concerning videos of protests from June 4, 2020, including, but not	Defendants have previously produced emails responsive to this request, as well as video		
	limited to, the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), that the	footage. There is no document/documents that note the specific videos the Mayor		
	Mayor viewed or that were shown to the Mayor on or after June 4, 2020.	vieweed or was shown.		
DR No. 74	Produce all documents concerning videos of Protests on Schedule A that occurred after June 4,			
DK 140. 74				
	2020, that the Mayor viewed or that were shown to the Mayor.	footage. There is no document/documents that note the specific videos the Mayor viewed		
		or was shown.		
DR No. 75	Produce all documents concerning Commissioner Dermot Shea's June 5, 2020 statement that	Defendants have previously produced emails and IAB/CCRB documents responsive to this		
	the NYPD response to the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) was			
	"executed nearly flawlessly," including any investigations into this statement and any	"49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief		
	discipline or recommendations of discipline that were made.	of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and		
		Strategic Response Group commands and are processing the documents located for		
		production by the Court-ordered deadline. Defendants are in the process of completing a		
		search of the shared drive of the Intelligence Division command and will produce any		
		responsive documents by the Court-ordered deadline.		
DR No. 76	Produce all documents concerning potential changes to policies or practices related to protest	Defendants have previously produced emails responsive to this request. Defendants have		
	and/or disorder policing that Defendants considered or implemented as a result of evaluations	searched for documents responsive to this request, including "49s," on the shared drives of	1	
	of or recommendations related to Defendants' responses to the Protests, including, but not	the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal		
	limited to, any internal NYPD evaluations or recommendations, evaluations or	Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group		
	recommendations by Defendant de Blasio or any agency of Defendant City (such as the Office			
	of the Inspector General, the Law Department, or the CCRB), or other evaluations, and	deadline. Defendants are in the process of completing a search of the shared drive of the		
	including, but not limited to, responsive documents from the NYPD's Chief of Department,	Intelligence Division command and will produce any responsive documents by the Court-		
	Operations Unit, Criminal Justice Bureau, Strategic Response Group, Disorder Control Unit,	ordered deadline.		
	Legal Bureau, and Office of Management and Planning.			
DD No. 77		Decreasing degraments to be provided A subdess to small the site of the site o	To the outent that any reservoire desires 1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.	
DR No. 77	Produce all documents concerning the Office of the Inspector General of the New York City	Responsive documents to be provided. A privilege log will be provided for privleged	To the extent that any responsive documents located are protected	
	Police Department's ("OIG-NYPD") June 26, 2019 report entitled, "Complaints of Biased	documents.	by privilege, Defendants will provide a relevant privilege log by the	
	Policing in New York City: An Assessment of NYPD's Investigations, Policies, and Training,"		Court-ordered date.	
	including all documents collected and reviewed during the course of investigating and then			
	drafting the report.			
DD N = 70		Description of the second of t	T-th	
DR No. 78	Produce all documents concerning the NYPD's decision to reject the three recommendations	Responsive documents to be provided. A privilege log will be provided ofr privleged	: To the extent that any responsive documents located are	
1	by the OIG-NYPD presented in the June 26, 2019 report, which stated: (1) the "NYPD should	documents.	protected by privilege, Defendants will provide a relevant privilege	
1	amend its Patrol Guide policies to explicitly require NYPD officers and non-uniformed		log by the Court-ordered date.	
	employees to report instances of biased policing upon observing or becoming aware of such			
	conduct"; (2) the "NYPD should amend its Patrol Guide policies so that complaints alleging the			
1				
	use of offensive or derogatory language associated with an individual's actual or perceived			
	protected status, such as racial slurs, are classified as biased policing if there is a			
1	discriminatory intent"; and (3) the "NYPD should amend its written investigative procedures			
	related to biased policing so that offensive or derogatory language associated with an			
	individual's actual or perceived protected status, such as an officer's use of racial slurs, is			
	classified, investigated, and adjudicated as a biased policing matter."			
DR No. 79	Produce all documents concerning the President of the NYPD Sergeants Benevolent	Defendants refer Plaintiffs to the documents responsive to this request produced via email		
	Association's circulation of a racist video in August 2019, as described in paragraph 157 of the	on March 8, 2022. No further documents exist, after a search of IAB, Chief of Department,	l .	
	Sierra First Amended Complaint (Dkt 98), including any investigations into this action and any			
	discipline or recommendations of discipline that were made.	discuss further.		

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DR No. 80	Produce every document that shows which officers wore what helmet numbers on the days	: Defendants have previously provided Plaintiffs with responsive documents listing the		
	on which the Protests occurred; if you are unable to conclude the answer with certainty,	names and helmet numbers of SRG Officers who were present at the Protests.		
	provide every log and other document that reflects which helmet numbers were assigned to	Defendants state that for all other officers,(1) the number on their helmet is the officer's		
	what officers on the days of the protests.	shield number, or (2) if the officer is of a rank that does not have a shield number, the		
		number on their helmet may be the officer's previous shield number.		
DR No. 81	Produce every document concerning Defendants' policies and practices concerning	No responsive documents exist.		
DR No. 82	distribution of protective gear by SRG officers and SRG protective helmet numbers.	Defendants refer Plaintiffs to the New York City Police Department - Process of	To the outent that any responsive desuments concerning	
DK NO. 82	Produce all documents concerning the NYPD's 2021 First Amendment Policy ("Response to First Amendment Activities" available at	Developing the NYPD Response to First Amendment Activities Procedure and Response to	To the extent that any responsive documents concerning consideration of comments or other factors located are protected	
	https://www1.nyc.gov/assets/nypd/downloads/pdf/public_information/draft-1a-activities-	Public Comments, and available at	by the deliberative process privilege or the attorney-client privilege,	
	forpublic- comment-2021-05-27a.pdf), its request for comment on the draft policy, the NYPD's	l ·	Defendants will provide a relevant privilege log by the Court-	
	consideration of such comments (and other factors) in developing the First Amendment Policy,		ordered date.	
	and the final policy adopted.~	Amendment Activities", effective 9/10/21 and available at		
		https://www1.nyc.gov/assets/nypd/downloads/pdf/public_information/213-20.pdf.		
		Defendants have searched for additional documents responsive to this request, including		
		"49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief	:	
		of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and		
		Strategic Response Group commands and are processing the documents located for		
		production by the Court-ordered deadline. Defendants are in the process of completing a		
		search of the shared drive of the Intelligence Division command and will produce any		
		responsive documents by the Court-ordered deadline.		
DR No. 83	Produce documents concerning the NYPD's activities relating to any marches, protests, or	Responsive documents to be provided prior to Court-ordered deadline		
	demonstrations occurring on or about June 26-27, 2021, including but not limited to any such			
DR No. 84	documents relating to protests organized by the Reclaim Pride Coalition.	Responsive documents for the protests on "Schedule "A"to be provided prior to Court-	Desuments concerning any prior protects are irrelevant and not	
DR NO. 84	Produce any and all documents or communications between Defendants and any borough		Documents concerning any prior protests are irrelevant and not	
	District Attorney's Office relating to mass arrests that resulted in dispositions that include decline to prosecute.	ordered deadline.	propotional to the needs of the case.	
DR No. 85	Produce any and all documents concerning policy or practice changes, changes in training, or	No responsive documents exist		
DK 140. 65	FINEST messages that were in some way a response to the judgment in Abdell v. City of New	The responsive documents exist		
	York, No. 05 Civ. 8453 (RJS) (S.D.N.Y.) and/or Gersbacher v. Winski, No. 14 Civ. 7600 (S.D.N.Y.);			
	the settlement in Rodriguez, Williams, James, et al v. City of New York, 12-cv-03389 (S.D.N.Y.);			
	or the District Court summary judgment decision in Dinler v. City of New York 1:04-cv-7921			
	(S.D.N.Y.) (Dkt. No. 312 therein).			
DR No. 86	Produce any and all documents concerning policy or practice changes, changes in training, or	No responsive documents exist		
	FINEST messages that were in some way a response to the settlement of the RNC cases,			
	including but not limited to MacNamara, et al., v. City of New York, et al., 04 Civ. 9216			
	(KMK)(JCF) (S.D.N.Y.).			
DR No. 87	Produce any and all documents concerning policy or practice changes, changes in training, or	No responsive documents exist		
	FINEST messages that were considered or adopted in some way a response to the events and			
	lawsuits described in ¶¶ 421-429 of the Sow First Amended Complaint (Dkt 96).			
DR No. 88	Produce all documents concerning persons at the June 4, 2020, Mott Haven Protest (Protest	Responsive documents previously provided. Any additional responsive document will be		
	No. 44 on Schedule A) throwing plastic bottles containing liquids and/or Molotov cocktails	provided prior to the Court-ordered date. Responsive documents can be found at: VOL001 VOL005 Not Confidential		
	(including but not limited to identifying videos depicting such acts).	VOL008 Confidential		
		VOL008 Not Confidential		
		VOL009 Confidential		
		VOL010 Confidential		
		VOL011 Confidential		
		VOL011 Not Confidential		
		VOL014 Confidential		
		VOL017_Confidential		
		VOL018_Not Confidential		
		VOL022_Not Confidential		
		VOL024_Not Confidential		
		VOL035_Confidential		
DR No. 89	Produce all documents concerning an attempt by someone at the June 4, 2020 Mott Haven	Responsive documents previously provided. Any additional responsive document will be		
		provided prior to the Court-ordered date. Responsive documents can be found at: VOL001		
	(including but not limited to identifying videos depicting such an act).	VOL005_Not Confidential		
		VOL008_Confidential VOL008_Not Confidential		
		l =		
		VOL009_Confidential VOL010 Confidential		
		VOL011 Confidential		
		VOL011 Not Confidential		
		VOL014_Confidential		
		VOL017_Confidential		
		VOL018 Not Confidential		
		VOL022 Not Confidential		
		VOL024_Not Confidential		
		VOL035_Confidential		
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DR No. 90	Produce all documents concerning the alleged stabbing of an NYPD officer at the June 4, 2020	Responsive documents previously provided. Any additional responsive document will be		
	Mott Haven Protest (Protest No. 44 on Schedule A), including but not limited to videos	provided prior to the Court-ordered date. Responsive documents can be found at: VOL00:	1	
	depicting such an act, records concerning medical treatment for the injury, documents	VOL005_Not Confidential		
	concerning the weapon that was used, and the identity of the perpetrator and any arrest or	VOL008_Confidential		
	prosecution documents.	VOL008 Not Confidential		
		VOL009 Confidential		
		VOL010 Confidential		
		VOL011_Confidential		
		VOL011 Not Confidential		
		VOL014 Confidential		
		VOL017 Confidential		
		VOL018 Not Confidential		
		VOL022_Not Confidential		
		VOL024 Not Confidential		
		VOL035 Confidential		
		Volume in the second se		
DR No. 91	Produce all documents, including, but not limited to, NYPD and CCRB documents, and	Responsive documents, to the extent any exist will be produced prior to the Court ordered	d	
	documents reflecting communications between the NYPD and CCRB, concerning the CCRB's	deadline. Logs/documents in the CCRB files previously produced note "challenges," if any	y.	
	"unprecedented challenges in investigating" complaints arising from the Protests, including,			
	but not limited to, the CCRB's inability to identify "officers due to the failure to follow proper			
	protocols, officers covering their names and shield, officers wearing protective equipment tha	ıt		
	did not belong to them, the lack of proper use of body worn cameras, as well as incomplete			
	and severely delayed paperwork" (from CCRB 2020 Protest Data Snapshot June 21, 2021).			
DR No. 92	Produce all radio transmissions concerning the June 4, 2020 Mott Haven Protest (Protest No.	ICAD's to be produced, as previously discussed. Radio transmissions are available at		
	44 on Schedule A) in complete form, i.e., not a combined set of transmissions, but the	VOL005_Not Confidential		
DD N. 02	complete transmission from each source point.	VOL010_Confidential		
DR No. 93	Produce all documents concerning Aviation Surveillance of the June 4, 2020 Mott Haven	Flight data reports to be provided, as previously discussed		
	Protest (Protest No. 44 on Schedule A), including but not limited to orders, directives, instructions, and communications.			
DR No. 94	Produce all documents concerning all NYPD investigations into the conduct of Sergeant	Defendants refer Plaintiffs to the documents responsive to this request produced via ema		
	Edward Mullins concerning his distribution of a racist video clip in August 2019, and	on March 8, 2022. No further documents exist, after a search of IAB, Chief of Department		
	concerning the February 2021 CCRB substantiation of three complaints against him for	Group 1, Group 25, Polie Commisisoner's office.		
	offensive language and abuse of authority.			
DR No. 95	Produce all documents concerning any NYPD investigation into the display of a "white power"	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of		
	symbol by any NYPD officer since January 1, 2014.	Department office are being searched.		
DR No. 96	Produce all documents concerning any NYPD investigations into the statements and conduct	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of		
	of Deputy Inspector James Kobel.	Department office are being searched.		
DR No. 97	Produce all documents concerning complaints of biased policing by NYPD officers since			
	January 1, 2014.			
DR No. 98	Produce all documents concerning oral or written statements by NYPD officers reflecting racia	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of		
	bias by that officer since January 1, 2014.	Department office are being searched.		
DR No. 99	Produce all complaints to the NYPD (whether formal or simply a report of information to the	1 '		
	NYPD) and investigations since January 1, 2014, concerning racist statements or conduct by ar	·		
	NYPD officer, regardless of whether the statement or conduct took place during, or outside of	f,		
	the officer's course of employment.			
DR No. 100	Produce all Documents created by the New York City Emergency Management (NYCEM)	Sample responsive documents have been produced, the remainder of the documents will		
	concerning any of the Protests, including but not limited to emails and/or alerts from the	be produced prior to the Court-ordered deadline		
	NYCEM Watch Command.			
DR No. 101	Produce all documents referenced in your Answers to the Complaints to the extent they have	None	Defendants object to Document Request No. 101 on the grounds	
	not been produced in response to other Requests.		that this request is vague and overbroad insofar as it does not	
			specify the documents plaintiffs contend have not been produced.	1